United States Environmental Protection Agency
Washington, D.C. 20460

Water Compliance Inspection Report

Section A: National Data System Coding (i.e., PCS)

Transaction Code	NPDES	yr/mo/day	Inspection Type	Inspector	Fac Type
1 N	WA R 0 0 9 7 3 0	1 6 0 4 2 9	~	R	2

Remarks: 21 ____ 66

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	BI	QA	Reserved
67 10 69	70	71	72	73 74 75 80

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*

BMC West Truss & Components
3200 35th Ave NE
Everett, WA 98201

Entry Time/Date	Permit Effective Date
4/29/16 9:20 am	1/2/15
Exit Time/Date	**Permit Expiration Date**
4/29/16 2:00 pm	12/31/19

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)

George Langlois, Operations Manager
425-789-3233, Cell: 425-754-0777
Fax: 425-303-9825
tim@mtbakerproducts.com

Other Facility Data *(e.g., SIC NAICS, and other descriptive information)*

SIC: 2439
NAICS: 321214

Lat/Long: 48.025810°/-122.183719°

Name, Address of Responsible Official/Title/Phone and Fax Number

Larry Waldron, Safety Manager
Cell: 253-405-6432
3200 35th Ave NE, Everett, WA 98201
larry.waldron@buildwithbmc.com

Contacted: ☑ Yes ☐ No

Section C: Areas Evaluated During Inspection *(Check only those areas evaluated)*

✓ Permit	☐ Self-Monitoring Program	☐ Pretreatment	☐ MS4
✓ **Records/Reports**	☐ Compliance Schedules	☐ Pollution Prevention	
✓ Facility Site Review	☐ Laboratory	✓ Storm Water	
☐ Effluent/Receiving Waters	✓ Operations & Maintenance	☐ Combined Sewer Overflow	
☐ Flow Measurement	☐ Sludge Handling/Disposal	☐ Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes / SEV Description

RECEIVED
MAY - 3 2016
Inspection & Enforcement Management Unit (IEMU)

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Brian Levo	EPA/OCE 206-553-1816	5/3/16
Signature of Management Q A Reviewer	**Agency/Office/Phone and Fax Numbers**	**Date**
Kimberly A. Ogle	EPA/OCE/MIEE 3-0955	6/22/16

EPA Form 3560-3 (Rev 1-06) Previous editions are obsolete.

ICIS, 5-10-16 JJ Brown

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Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*	Entry Time/Date	Permit Effective Date
BMC West Truss & Components 3200 35th Ave NE Everett, WA 98201	5/10/16 8:35 am	1/2/15
	Exit Time/Date 5/10/16 10:55 am	Permit Expiration Date 12/31/19

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	Other Facility Data *(e.g., SIC NAICS, and other descriptive information)*
Larry Waldron, Safety Manager 253-582-1444, Cell: 253-405-6432 larry.waldron@buildwithbmc.com	SIC: 2439 NAICS: 321214 Lat/Long: 48.025810°/-122.183719°
Name, Address of Responsible Official/Title/Phone and Fax Number Larry Waldron (same as above) 3200 35th Ave NE, Everett, WA 98201	Contacted ☑ Yes ☐ No

Section C: Areas Evaluated During Inspection *(Check only those areas evaluated)*

✓ Permit	✓ Self-Monitoring Program	☐ Pretreatment	☐ MS4
✓ **Records/Reports**	☐ Compliance Schedules	☐ Pollution Prevention	
✓ Facility Site Review	☐ Laboratory	✓ Storm Water	
✓ Effluent/Receiving Waters	✓ Operations & Maintenance	☐ Combined Sewer Overflow	
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MAY 16 2016
Inspection & Enforcement Management Unit (IEMU)

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Signature of Management Q A Reviewer	Agency/Office/Phone and Fax Numbers	Date
Kimberly A. Ogle	EPA/OCE/MIRE 3-0955	6/22/16

EPA Form 3560-3 (Rev 1-06) Previous editions are obsolete.

ICIS (per advance copy)
5-12-16

NPDES
Inspection Report

BMC West Truss & Components
Everett, WA

April 29th, 2016
May 10th, 2016

Prepared by:

Brian Levo
Environmental Protection Agency, Region 10
Office of Compliance and Enforcement
Inspection and Enforcement Management Unit

Table of Contents

(Unless otherwise noted, all details in this inspection report were obtained from conversations with Larry Waldron, George Langlois, or from observations during the inspections.)

I. Facility Information

Facility Name:	BMC West Truss & Components
Parent Company:	BMC Holding Corp.
SIC Codes:	2439 – Structural Wood Members, Not Elsewhere Classified 5211 – Lumber and Other Building Materials
NAICS Codes:	321214 – Truss Manufacturing
Facility Contact(s):	Larry Waldron, Safety Manager Office: (253) 582-1444 Cell: (253) 405-6432 E-mail: larry.waldron@buildwithbmc.com George Langlois, Operations Manager Office: (425) 789-3233 Cell: (425) 754-0777 E-mail: george.langlois@buildwithbmc.com
Facility/Mailing Address:	3200 35th Ave NE Everett, WA 98201
Lat/Long:	+48.025810°/-122.183719°
Permit Number:	WAR009730

II. Inspection Information

Inspection Dates/Times/ Weather:	April 29th, 2016 Arrival Time: 9:20am Weather: Overcast	Departure Time: 2:00pm
	May 10th, 2016 Arrival Time: 8:35am Weather: Sunny	Departure Time: 10:55am
Inspector:	Brian Levo, Inspector EPA Region 10, OCE / IEMU (206) 553-1816	

Purpose:	Determine compliance with the Washington State Department of Ecology (DOE) National Pollutant Discharge Elimination System (NPDES) Industrial Stormwater General Permit (ISGP) and the Clean Water Act.

III. Permit Information

BMC West Truss & Components in Everett, WA, (hereafter referred to as "BMC") is currently permitted under the ISGP (permit ID WAR009730) with effective date of 1/2/15. Prior to this permit, the facility was covered by the previous iteration of the ISGP permit (original effective date of 1/1/2010) with the same permit ID.

IV. Inspection Chronology

The initial inspection on 4/29/16 was unannounced. I presented my credentials to George Langlois, Operations Manager, shortly upon arriving at the facility at 9:20 am on 4/29/16. I then began the inspection with an opening conference where I discussed the purpose and expectations of the inspection. I then conducted a site walkthrough followed by a file review. Mr. Langlois informed me that Larry Waldron, Safety Manager, was responsible for stormwater compliance at BMC, in addition to two other locations owned by BMC's parent company, BMC Holding Corp. Mr. Langlois said that Mr. Waldron was not able to be present for the 4/29/16 inspection since Mr. Waldron was involved in an internal health and safety audit at another BMC Holding Corp. facility in Tacoma, WA. I called Mr. Waldron during the records review portion of the 4/29/16 inspection to discuss my observations from the site walkthrough and to request that BMC provide copies of records. I informed both Mr. Waldron and Mr. Langlois that I would like to return to the facility when Mr. Waldron was present to do a walkthrough with him. I then departed the facility at 2:00 pm on 4/29/16.

Following the initial inspection, I called Mr. Waldron and he agreed to meet me at BMC on 5/10/16. I presented my credentials to Mr. Waldron shortly after I arrived at the facility at 8:35 am on 5/10/16. I discussed the purpose and expectations of the inspection and then did a site walkthrough. Following the walkthrough Mr. Waldron and I returned to his office where we discussed my inspection observations and he provided copies of some of the records I had previously requested. I then informed Mr. Waldron I would perform a comprehensive closeout with him after he had provided copies of the rest of the records and I had a chance to review them. I then departed the facility at 10:55 am on 5/10/16.

Mr. Waldron e-mailed me copies of the records I had requested following the 5/10/16 inspection. I reviewed the records and called Mr. Waldron on 5/23/16 to conduct a comprehensive closing conference for the inspections. I also sent him an e-mail summarizing the areas of concern (**Attachment G**).

I was accompanied by Mr. Langlois during the entire inspection on 4/29/16, with the

exception of the records review. I was accompanied by Mr. Waldron during the entire inspection on 5/10/16. I was not denied access to the facility during either inspection and was allowed to inspect all areas that I requested to inspect. During the inspection on 4/29/16 I provided Mr. Langlois with copies of the EPA Small Business Resources Information Sheet and a printout from the DOE ISGP webpage.

V. Background and Activity

According to Mr. Waldron and Mr. Langlois, approximately 60% of BMC's business is lumber storage (SIC 5211) and 40% is wood roof truss manufacturing (SIC 2439). They said that BMC distributes locally and is one of three BMC Holding Corp. facilities located in the Pacific Northwest (the other two are in Issaquah and Tacoma, WA). BMC Holding Corp. is a nationwide corporation with more than 100 facilities across the U.S. Mr. Langlois said that the facility has been a lumber yard since the 1960's and has been owned by BMC for the past 20 years. He said that BMC employs approximately 100 full-time employees.

According to BMC's most recent notice of intent (NOI), dated 5/21/14, the BMC property is 13.8 acres in size and is entirely paved, with the exception of portions of the yard on the south side of the office building (**Attachment A**). BMC owns the property including the vegetated area on the north side of the BMC yard. The footprint of the vegetated area is not included in the acreage total in the NOI.

Generally, all manufacturing takes place inside the facility buildings but most lumber and constructed trusses are stored outside. There are five stormwater catch basins. Catch basin #01 is located near the southwest corner of the truss manufacturing building while catch basins #02, #03, #04, and #05 are along the north and northwest sides of the plywood storage building (**Photo 1**, **Attachment B**). Stormwater entering catch basins #01 and #05 are sampled and the reported as outfalls #01 and #05, respectively.

It is unclear where stormwater discharges off-site. Neither BMC's 2014 NOI nor any of the other maps or documents reviewed in the course of this inspection, named a specific surface water or other conveyance where BMC's stormwater discharges to off-site. The SWPPP map shows a stormwater line connected to catch basin #01 dead-ending on the BMC property (**Photo 1**). The SWPPP map also shows a stormwater line routing from catch basin #05 and extending west to the edge of the map. During the course of this inspection, both Mr. Langlois and a BMC employee named Bill Tickle, said that they thought that the catch basins drained to a ditch along the west side of the property and flows north to the Union Slough. However, Mr. Waldron said he thought that the catch basins routed to a municipal stormwater drainage system along 35th Ave NE. Mr. Tickle said he did not think that there was a municipal stormwater sewage system located on Smith Island (the name for the body of land where BMC and its neighboring businesses are located). The Drainage Inventory Map available on the Snohomish County website does not show any municipal stormwater infrastructure on Smith Island. The DOE Permitting and Reporting Information System (PARIS) website identifies the receiving water as being the Union Slough.

According to Mr. Waldron, BMC has never had a stormwater inspection prior to this one. He confirmed that he is responsible for environmental compliance in addition to health & safety, workers compensation, and other responsibilities, for the Everett, Issaquah, and Tacoma facilities owned by BMC Holding Corp. Mr. Waldron said that he has worked in these roles since 2007, except for a period between Sep. 2009 and April 2010, when he was temporarily laid-off by BMC due to financial difficulties. He said that he typically works Mondays and Tuesdays at the Everett location, and then splits the other three week days between the Issaquah and Tacoma facilities.

Mr. Langlois said that he has been the Operations Manager of BMC for approximately three years.

VI. Facility Review

Note that this section includes observations from both the 4/29/16 and 5/10/16 inspections. Maps of the facility are included in **Attachment A** and **Photo 1** (**Attachment B**).

North of the facility office and plywood storage building were catch basins #02, #03, #04, and #05 (**Photos 2-8**). Collectively these catch basins drain a small portion of the south end of the lumber storage yard and the roof water from the plywood storage building. According to Mr. Langlois, the facility buildings have asphalt shingle roofing. I observed forklift traffic in all outdoor areas of the facility with the exceptions of the area immediately adjacent to the office and at the employee parking area (both locations where employee cars were parked). Similarly, there were semi-trucks parked in close proximity to catch basin #05. According to Mr. Langlois, semi-trucks enter and exit from 35th Ave NE at the area west of the plywood storage building. The semi-trucks can also exit from the paved asphalt south of the office building. Mr. Langlois said that trucks unload both at the center of the lumber storage yard and also near the southeast corner of the truss manufacturing building, and load in the truck loading area.

Mr. Langlois estimated that the BMC fleet consisted of 10 pick-up trucks, 18 forklifts, and 13-14 semi-trucks. Mr. Waldron said that heavy vehicle maintenance is conducted off-site by Motor Trucks NW, but light vehicle maintenance, including oil changes, are conducted on-site by Motor Trucks NW and PAPÉ, as well as, vehicle fueling which is done by Associated Petroleum Products (APP). He said that these companies implement their own stormwater best management practices (BMPs) when conducting their work at BMC. Mr. Langlois said that vehicle maintenance is conducted both on the southwest side of the lumber yard (near catch basin #05) and on the southeast side of the truck loading area. Mr. Waldron agreed that maintenance occurs in the truck loading area, but was not sure if vehicle maintenance also occurred near the lumber storage yard. He said that it was possible that vehicle maintenance also occurred here.

The lumber storage yard included both packaged and unpackaged (exposed) lumber. Mr. Langlois said that some of the exposed wood in the lumber storage yard is treated. He said that the wood is treated off-site before it arrives at BMC. He took two tags off of

some of the wood stored in the yard as examples of treatment type. He also provided copies of material safety data sheets (MSDS) for treated lumber (**Attachment D**). The MSDS show that the wood treatments contain small amounts of metals and metal compounds that include copper, arsenic, and chromium.

At the time of the 4/29/16 inspection, there was sheen on the stormwater entering catch basin #03 (**Photo 5**) and sheen on the pavement in proximity to catch basin #05 (**Photo 7**). I noted additional sheen in two other areas on the north side of the lumber yard during the 4/29/16 inspection (**Photos 17 & 18**). Mr. Langlois said that employees did not implement spill response BMPs to address small spots of sheen such as these.

I noted that none of the BMC catch basins had filter inserts installed on 4/29/16. Mr. Waldron said that the filter inserts are supplied by Grainger, and that they are replaced every three to four months, but they had just been removed sometime on 4/18/16 or 4/20/16, and had not been replaced yet. During my follow-up inspection on 5/10/16 filter inserts were installed in catch basins #02, #03, #04, and #05 (**Photo 8**). Mr. Waldron showed me the filter insert packaging and provided me a product sheet that had been included in the packaging (**Attachment C**). The filter inserts were an Ultra-DrainGuard Oil & Sediment Plus Model.

There was a small fuel storage locker at the northwest corner of the plywood storage building and a spill kit was located nearby. West of the facility entrance was an employee parking area (at the end of 35th Ave NE). According to Mr. Langlois and Mr. Tickle, they believe that stormwater from the catch basins route to a vegetated ditch on the west side of the employee parking area (**Photos 9-11**) where it routes north in the ditch and discharges to the Union Slough. I observed a ditch between 35th Ave NE and Hwy 529, but due to the high amount of cattails and other vegetation I was not able to see any pipes entering the ditch. The contour of the land appeared to slope north.

Near the northwest corner of the lumber yard was a low spot. At the time of the 4/29/16 inspection, a pool of water extending over 100 ft. into the lumber yard was present (**Photos 12-15**). According to both Mr. Langlois and Mr. Waldron, this pooling was caused by run-on water from the ditch, and they said that it commonly happened when there was a hard rain. Neither of them could specify the exact frequency that this occurs or how much rainfall is necessary to cause run-on to happen. I observed a forklift drive through the pooled water during my 4/29/16 inspection, and noted that there was sheen on the water surface (**Photo 14**). Mr. Langlois said that the run-on water may be tidally influenced from Union Slough, but Mr. Waldron said that he suspected run-off from Hwy 529 was the source of the water. Mr. Tickle said that the BMC property was built on pavement which capped fill material from historic dredging of the surrounding sloughs, and overtime the ground beneath some of the paved areas sank.

The vegetated area on the north side of the BMC property was flat, thickly vegetated, and the soil was saturated with water during both inspection days (**Photo 16**). Due to the vegetation and the flat contour there was no obvious flow path of stormwater.

At the time of the 4/29/16 inspection, there were four large dumpsters stored near the truck loading area (**Photos 20 & 21**). Mr. Langlois said that two of them were for garbage, one was for metal scraps, and one was for wood scraps. Only one of the garbage dumpsters had a lid and it was open at the time of the 4/29/16 inspection. Mr. Waldron said that these dumpsters previously had lids. Mr. Langlois said that the wood dumpster is emptied approximately every 2-3 weeks, the garbage dumpsters approximately every week, and the metal scrap dumpster is emptied on an as-needed basis.

At the time of the 4/29/16 inspection, there were two drums of Blue Def stored without secondary containment (**Photo 23**). Mr. Langlois said that Blue Def is a fuel additive for diesel vehicles to improve the air quality of exhaust. He said that it is added to the semi-trucks in the truck loading area. Mr. Langlois said that one of the drums was empty and the other was partially full.

At the time of the 4/29/16 inspection, there were 10 paint cans stored uncovered and without secondary containment at the eastern corner of the truck loading area (**Photo 24**). Mr. Langlois said that they were all partially-full.

There was a concrete secondary containment area at the northeast corner of the miscellaneous storage building #2 that had a 55-gallon drum of kerosene and two small fuel containers stored inside it (**Photos 25 & 26**). At the time of the 5/10/16 inspection, the Blue Def drums from the truck loading area were also stored at this location. Two spill kits were located in proximity to this secondary containment area.

A yard sweeping machine was parked at miscellaneous storage building #2 (**Photo 27**). Mr. Waldron said that BMC contracts Best Parking Lot Cleaning Inc. (BPLC) to conduct bi-weekly vacuum cleaning of the facility, but BMC also uses this sweeper on a daily basis (at the end of the work day) to clean the yard. He said facility representatives refer to it as the 'mini-Zamboni' and said that BMC purchased it in Mar. of 2014.

At the southeast corner of the miscellaneous storage building #2, were three 55-gallon drums and a small drum labeled as 'Ultra-Duty Grease' stored without secondary containment, as well as, a waste bin without a lid (**Photo 28**). At the time of the 4/29/16 inspection, I noted several other waste bins without lids throughout the facility that contained wood scraps and miscellaneous garbage (**Photos 31-37**). Mr. Waldron said that these waste bins do not have lids and that BMC consolidates the contents of the various waste bins in the large dumpsters on an as-needed basis.

Manufactured trusses were stored in a yard on the southeast side of the facility (**Photo 29**). Mr. Langlois said that the trusses are made of untreated wood, but they also have some small metal components. I noted that the center part of the truss yard slopes to a low spot near the southeast corner of the BMC property (**Photo 30**). Vegetation present along the boundary of the yard made it unclear where stormwater from this area flows.

Catch basin #01 was located near the southwest corner of the truss manufacturing building (**Photo 38**). At the time of the 4/29/16 inspection, there was sediment in close

proximity to catch basin #01. Mr. Waldron said that unpaved areas south of the office may be in part responsible for this sediment. I noted that stormwater filter inserts were not installed in this drain on either 4/29/16 or 5/10/16. Mr. Waldron said that filter inserts were not being implemented at this catch basin.

VII. Records Review

The following documents were reviewed:

- Current WAR009730 Permit – There was a copy of the current permit on-file.

- Notice of Intent (NOI) – There was a copy of BMC's most current NOI (dated 5/21/14) on-file.

- Stormwater Pollution Prevention Plan (SWPPP) – The SWPPP on-file was dated 1/23/07 and a copy is included as **Attachment E**. According to Mr. Waldron, this SWPPP was written by BMC Holding Corp. He said that the SWPPP was outdated and he was in the process of personally re-writing the SWPPPs for this facility, and the facilities in Issaquah and Tacoma. A draft copy of the new SWPPP e-mailed to me by Mr. Waldron is included on the CD attached to this report.

  Observations of the contents of the SWPPP available at the time of inspection (**Attachment E**):
  - Pollution Prevention Team – Mr. Waldron said that the names listed on the team were no longer current.
  - Site Map – Displayed building and catch basin location information but was missing many of the details required by the permit (**Photo 1, Attachment B**).
  - Sampling Plan
    - The sampling plan was missing details required by the permit, including descriptions of the points of discharge, justifications for why each sampling location was chosen, the specific parameters sampled, details of collection/handling of samples, identification of sampling staff, and identification of the lab that processes samples.
    - Mr. Waldron confirmed that he samples catch basin #01 and catch basin #05. He said that the facility yard sometimes floods during high rains, which can cause catch basin #05 to be underwater. In those instances, Mr. Waldron said he samples one of the upstream catch basins instead and reports those results on the DMR.
    - Mr. Waldron said that he collects stormwater flowing into the catch basin by holding the sampling bottle upright against the side of the inside of the catch basin.
  - Inspections – Described annual visual inspections and a quarterly storm water quality visual report, but these sections did not cover the monthly inspection requirements included in the permit.
  - Best Management Practices (BMPs) – Did not include details for BMPs

implemented on-site that resulted from corrective actions (CAs). Nor did it include any bacterial contamination BMPs.

- Employee Training – Page 13 of the SWPPP states that all employees are trained in stormwater compliance upon hiring, and employees whose job functions include industrial work are retrained each year. At the time of the 4/29/16 inspection, a SWPPP monthly safety meeting training log dated 4/5/11 was on-file. Mr. Waldron e-mailed me SWPPP monthly safety meeting training logs for 2012-2015 following the inspection. These training logs are included on the CD attached to this report.

- Site Inspection Reports – I asked to review the monthly inspection reports the facility had on-file dating back to May of 2011. The facility provided copies of quarterly storm water quality visual reports from the second quarter of 2011 (Q2/2011) through Q2/2015. Mr. Waldron e-mailed me copies of these quarterly reports and they are included on the CD attached to this report. A sample of these reports is included as **Attachment F**.

  Mr. Waldron said that he does site walkthroughs every one to two weeks as a component of his health and safety inspections. He said that he also looks at stormwater compliance related issues during these inspections and addresses problems as they come up. However, Mr. Waldron said that he does not have records of these inspections which demonstrate that stormwater was reviewed.

- Annual Reports and Discharge Monitoring Reports (DMRs) – I reviewed the annual reports from 2011-2014 and the DMRs from Q2/2011- Q2/2016. Mr. Waldron e-mailed me copies of the annual reports following the 5/10/16 inspection. Copies of BMC's DMRs were taken from the DOE PARIS website. Both the annual reports and DMRs are included on the CD attached to this report.

  The following table summarizes notes about monitoring and CAs at each monitoring location:

Monitoring Location ID	Notes
#01	**2011** • No discharge in Q3. **2012** • Level 1 CA triggered for pH but was not addressed in the annual report. • Total suspended solids (TSS) and chemical oxygen demand (COD) were not reported on DMRs in Q2 or Q4. • No discharge in Q3. **2013** • TSS and COD were not reported on DMR in Q1. • No discharge in Q2 and Q4.

#01	• No DMR for #01 submitted in Q3. **2014** • TSS and COD were not reported on DMRs in Q1 and Q2. • Q2 DMR submitted late (dated 8/20/14). • No DMRs submitted in Q3 and Q4. **2015** • Level 1 CA triggered for turbidity in Q4. A note included with the DMR said that a third party company cleans the facility weekly, BMC also cleans the facility using their own cleaning machine, and BMC monitors BMPs weekly. • No discharge in Q2 and Q3.
#05	**2011** • Level 1 CA triggered for turbidity but was not addressed in the annual report. • Level 3 CA triggered for copper (Cu). The annual report said that lumber and forklift traffic are responsible for the high level of Cu. It also said that roof drainage helped contribute to flooding at the catch basin #05 sampling location in Q1/2011, resulting in BMC collecting the quarterly sample from a "different run off area". The annual report said that BMC conducted daily inspections, daily clean-up, and had "employees cleaning area". • Oil & Grease was not reported on DMR in Q2. • No discharge in Q3. **2012** • Level 1 CAs triggered for pH, TSS, and COD, but were not addressed in the annual report. • Level 2 CA triggered for turbidity and zinc (Zn). The annual report said that an inspection was conducted and corrections were made. • Level 3 CA triggered for Cu. The annual report said that BMC's BMP's are continuing to lower Cu levels. • The annual report cited increases in product coming into the facility and increases in forklift traffic as being responsible for exceedances. • TSS and COD were not reported on DMRs in Q2 or Q4. • No discharge in Q3. **2013** • Level 1 CAs triggered for turbidity and Cu. The annual report said that inspections were increased to

#05	weekly, "monitoring and sweepings have doubled", stormwater inserts were installed, and a sweeping company is contracted to sweep once a month. • TSS and COD were not reported on DMRs in Q1 and Q3. • No discharge in Q2 and Q4. **2014** • Level 1 CA triggered for turbidity. The annual report described the same BMPs described as Level 1 CA in the 2013 annual report. The annual report also said that BMC purchased a street sweeping machine. • Level 2 CA triggered for Cu. The annual report said that BMC replaced filter inserts, added an extra street sweeping, moved forklifts and high traffic areas away from storm drains, conducted an extra inspection, purchased garbage cans for each forklift, assigned forklift operators sections of the yard they were responsible for cleaning, and began using a six sigma system to comply with stormwater requirements. • The annual report said that the drains were backing up and overflowing the forklift staging area, so BMC hired a company to clean all of the storm drain vaults and purchased two spill kits in May 2014. • TSS and COD were not reported on DMRs in Q1 and Q2. • Q2 DMR submitted late (dated 8/20/14). • No DMRs submitted in Q3 and Q4. **2015** • Level 1 CAs triggered for pH in Q1 and turbidity in Q4. A note included with the Q1 DMR said that a third party company cleans the facility twice a week, BMC monitors BMPs weekly, and "spill kits and extra spill reducers" are being used. • No discharge in Q2 and Q3.

- Lab Reports & Chain-of-Custodies (COCs) – At the time of the 4/29/16 inspection, I conducted a cursory review of the lab reports and COCs from Q2/2011-Q1/2016. There was not a COC for Q3/2013 on-file. Mr. Waldron e-mailed me copies of the lab reports and COCs from Q2/2011-Q2/2014 after the inspection. Copies of these documents are included on the CD attached to this report.

  According to the lab reports and COCs, all parameters were analyzed off-site by Spectra Laboratories ("Spectra") in Tacoma, WA. I noted that sample temperature upon receipt was only recorded in one quarter over the past five years. That

quarter was Q4/2015 (**Photos 39 & 40**). The COCs from Q4/2015 showed that the temperature upon receipt was greater than 10°C.

I also noted that the Spectra lab report dated 12/23/15 showed a fecal coliform result for monitoring point #01 that said 'ND' (**Photo 41**), however, on the Q4/2015 DMR the fecal coliform was listed as '50' for outfall #01 (**Photo 42**).

- Street Sweeping and Water Jet Invoices – At the time of the 4/29/16 inspection I conducted a cursory review of the invoices from BPLC on-file. Mr. Waldron said that BPLC is contracted to conduct vacuum sweeping at BMC and also use a water jet to clean out the storm drains. The facility had BPLC invoices from 5/15/14 to 4/1/16 on-file. Copies of these invoices are included on the CD attached to this report.

  The BPLC invoices stated that BMC received vacuum sweeping services twice monthly. There were missing invoices including 3/15/16, 3/1/16, 1/15/16, 7/15/15, 7/1/15, 7/1/14, and all invoices prior to 5/15/14.

VIII. Observed Discharge

I did not observe any discharge during either the 4/29/16 or 5/10/16 inspections.

IX. Receiving Water

According to the DOE PARIS website the receiving water for stormwater discharges from this facility is the Union Slough.

X. Areas of Concern

A. Off-Site Discharge Locations

Section S4.B.1.d. of the ISGP states "The Permittee shall obtain *representative samples…*"

Appendix 2 of the ISGP defines representative sample as "a sample of the *discharge* that accurately characterizes *stormwater runoff* generated in the designated drainage area of the *facility*."

Section S4.B.2.a. of the ISGP states that "The Permittee shall designate sampling location(s) at the point(s) where it discharges *stormwater* associated with *industrial activity* off-site."

As is described in detail in the Background and Activity section of this report, it is unclear where stormwater discharges off-site. Mr. Langlois and Mr. Tickle believe that catch basins #01 and #05 drain to a ditch along the west side of the property that flows north to the Union Slough, but Mr. Waldron said he thought that these catch basins

routed to a municipal stormwater drainage system along 35th Ave NE.

Mr. Waldron said that he collects stormwater flowing into the catch basins by holding the sampling bottle upright against the side of the inside of the catch basins. This sampling method, however, does not collect stormwater flowing into the #05 catch basin from the other catch basins upstream.

Without further knowledge of how and where stormwater discharges off-site, it is unclear if catch basins #01 and #05 should be designated as BMC's sampling locations. Additionally, the samples collected at catch basin #05 are not representative of the entire drainage area since it does not account for stormwater entering catch basins #02, #03, and #04 upstream.

B. Oil Sheen

Section S3.B.4.b.i.3) of the ISGP states that the SWPPP must include preventative maintenance BMPs including a requirement that the permittee must:

- **b)** "…Take leaking equipment and *vehicles* out of service or prevent leaks from spilling on the ground until repaired.
- **c)** Immediately clean up spills and leaks (e.g., using absorbents, vacuuming, etc.) to prevent the *discharge of pollutants*."

As is described in detail in the Facility Review section of this report, there was oil sheen noted in multiple locations at the facility during the 4/29/16 inspection (**Photos 5, 7, 14, 17, 18, and 19**). Mr. Langlois said that employees did not implement spill response BMPs to address small spots of sheen such as these.

Oil leak BMPs were not being implemented at the time of the 4/29/16 inspection.

C. Run-On Water

Section S3.B.4.b.ii.2)a) of the ISGP states that permittees shall include BMPs to minimize exposure of material storage areas including "…grading, berming, or curbing to prevent *runoff* of contaminated flows and divert run-on away from these areas."

At the time of the 4/29/16 inspection, a pool of water extending over 100 ft. into the lumber yard was present (**Photos 12-15**). According to both Mr. Langlois and Mr. Waldron, this pooling was caused by run-on water from the ditch along the west side of the property, and they said that it commonly happened when there was a hard rain.

Mr. Waldron said that there were no plans to address the low spot of the yard where this run-on occurs. I asked him how much it would cost to address this issues. Mr. Waldron made a rough estimate that it would cost between $75,000-$100,000 to berm the perimeter of the yard to prevent run-on water.

D. Uncovered Dumpsters

Section S3.B.4.b.i.2)d) of the ISGP states that the permittee shall "Keep all dumpsters under cover or fit with a lid that must remain closed when not in use."

At the time of the 4/29/16 inspection, there were two large garbage dumpsters, one large metal scraps dumpster, one large wood waste scraps dumpster, and nine other waste bins that either did not have lids or the lids were not closed (**Photos 20, 21, 31-37**).

E. Secondary Containment

Section S3.B.4.b.i.4) of the ISGP states that the permittee shall:

> **a)** "Store all chemical liquids, fluids, and petroleum products, on an impervious surface that is surrounded with a containment berm or dike that is capable of containing 10% of the total enclosed tank volume or 110% of the volume contained in the largest tank, whichever is greater."

At the time of the 4/29/16 inspection, there were two drums of Blue Def (**Photo 23**) 10 paint cans (**Photo 24**), three 55-gallon drums, and a small drum labeled as 'Ultra-Duty Grease' (**Photo 28**) stored without secondary containment. According to Mr. Langlois, one of the Blue Def drums was empty but the other drums, as well as the paint cans, were at least partially-full.

F. Corrective Actions Incomplete

Section S8.B. of the 2010 ISGP states "Permittees that exceed any applicable *benchmark* value(s)…shall complete a Level 1 Corrective Action for each parameter exceeded…"

The DMRs and annual reports (included on the CD attached to this report) showed instances where Level 1 CAs were triggered but no CAs to address exceedances were documented. This occurred at outfall #01 for a below range pH value in Q2/2012. This also occurred at outfall #05 for a turbidity exceedance in Q4/2011, exceedances of COD and TSS in Q1/2012, and a below range pH value in Q2/2012.

The 2013 and 2014 annual reports showed that the exact same Level 1 CAs were described in response to turbidity and Cu exceedances at outfall #05 in both years. The annual reports said that that inspections were increased to weekly, "monitoring and sweepings have doubled", stormwater inserts were installed, and a sweeping company was contracted to sweep once a month.

Additionally, filter insert BMPs were identified as Level 1 CAs at outfall #05 in the 2013 annual report, however, at the time of the 4/29/16 inspection none of the BMC catch basins had filter inserts installed. During my follow-up inspection on 5/10/16 filter inserts were installed in catch basins #02, #03, #04, and #05 (**Photo 8**).

Section S8.C. of the 2010 ISGP states "Permittees that exceed an applicable *benchmark* value (for a single parameter) for any two quarters during a calendar year shall complete a Level 2 Corrective Action …" which requires structural source control BMPs.

The DMRs and annual reports showed instances where Level 2 CAs were triggered but no structural source control BMPs to address the exceedances were documented. This occurred at outfall #05 for turbidity and Zn exceedances in 2012. The 2012 annual report said that an inspection was conducted and corrections made in response to these exceedances. No additional details about what these corrections were was documented.

Section S8.D. of the 2010 ISGP states "Permittees that exceed an applicable *benchmark* value (for a single parameter) for any three quarters during a calendar year shall complete a Level 3 Corrective Action …" which requires treatment BMPs.

The DMRs and annual reports showed instances where Level 3 CAs were triggered but no treatment BMPs to address the exceedances were documented. This occurred at outfall #05 for Cu exceedances in 2011 and again for Cu exceedances in 2012. The 2011 annual report said that the CA responses included daily inspections, daily clean-up, and had "employees cleaning area". Similarly, the 2012 annual report said that BMC's BMP's are continuing to lower Cu levels.

G. SWPPP Outdated And Missing Information

Section S3.A.4.c. of the ISGP states "If a Permittee covered under the 2010 ISGP needs to update their SWPPP to be consistent with the 2015 ISGP, the update shall be completed by January 30, 2015."

Section S3.B. of the ISGP identifies the specific content required to be included in the SWPPP. This includes:

1. A site map that identifies scale (or relative distance), stormwater discharge points off-site, and paved areas.
3. Identify specific individuals on the pollution prevention team.
4. BMPs implemented on-site.
5. Descriptions of the points of discharge, why each sampling location was chosen, the specific parameters sampled, details of collection/handling of samples, identification of sampling staff, and identification of the lab that processes samples.

Table 6 of **Section S6.C.1.c.** of the ISGP identifies bacterial contamination BMP requirements associated with facilities that have fecal coliform bacterial effluent limits.

At the time of the inspection, the SWPPP on-file was dated 1/23/07 (**Attachment E**).

The site map did not include a scale bar, show where stormwater discharges off-site, or show which areas of the yard are paved (**Photo 1**).

The pollution prevention team was listed on page 7 of the SWPPP. Mr. Waldron said that the names listed on the team were no longer current.

The sampling plan in the SWPPP does not include descriptions of the points of discharge, justifications for why each sampling location was chosen, the specific parameters sampled, details of collection/handling of samples, identification of sampling staff, and identification of the lab that processes samples. Additionally, Mr. Waldron stated that he samples catch basins upstream of #05 during instances when catch basin #05 is under water, however, these details and justification for why this is done is also not included in the sampling plan.

The BMPs described in the SWPPP did not include any of the CA BMPs being implemented on-site or the frequency of their maintenance and implementation. Additionally, BMC is required by DOE to monitor discharges for fecal coliform per the 303(d) impaired waters requirements on page 30 of the ISGP. However, the BMC SWPPP did not identify any bacterial contamination BMPs as required by the permit. Mr. Waldron said that he was not aware of the bacterial contamination BMP requirements.

H. Inspections

Section S7.A.1. of the ISGP states "The Permittee shall conduct and document visual inspections of the site each month."

Section S7.B. of the ISGP details the required contents for each inspection, including observations for the presence of illicit discharges, verification of potential pollutant sources, verification of site map accuracy, and an assessment of BMPs.

For the period of May 2011–Apr. 2016, BMC had quarterly inspection reports from Q2/2011-Q2/2015. These quarterly inspections only included a visual assessment at the outfalls. These visual assessments are included on the CD attached to this report and a sample report is included as **Attachment F**.

Mr. Waldron said that he does site walkthroughs every one to two weeks as a component of his health and safety inspections. However, Mr. Waldron said that he does not have records of these inspections which demonstrate that stormwater was reviewed.

Monthly inspections have not been conducted.

I. Discharge Monitoring

Section S4.B.1.a. of the ISGP states "The Permittee shall sample the *discharge* from each designated location at least once per quarter…"

According to the DMRs, there were no discharges from either catch basins #01 or #05 in Q3/2011, Q3/2012, Q2/2013, Q4/2013, Q2/2015, and Q3/2015. Mr. Waldron said that he conducts the sampling, and he is regularly on-site at BMC on Mondays and Tuesdays

during the week. He said that in order to ensure that a sample is collected during a rain event, he regularly checks the weather to determine when it's necessary to make an extra trip to BMC for sample collection.

Following the inspection I accessed historical rainfall information from the National Oceanic and Atmospheric Administration's Climate Data Online website from a weather station in Everett, WA, for Q2/2013 and Q4/2013 (**Attachment H**). This weather information showed that there were seven weekdays in Q2/2013 and four weekdays in Q4/2013 in which there was at least 0.25" of rainfall. Considering the rainfall during these quarters, and that BMC operates Mon.-Fri., it is unlikely that there was insufficient rainfall to complete sampling at catch basins #01 and #05 during those two quarters.

Table 2 & **Table 3** of **Section S5.** of the ISGP identify sampling requirements for industries under the 2439 SIC code, including oil sheen, COD, and TSS parameters.

According to the DMRs, oil & grease was not reported in Q2/2011. The DMRs, COCs, and lab reports, showed that COD and TSS were not sampled at either catch basin #01 or #05 in Q2/2012, Q4/2012, Q1/2013, Q1/2014, and Q2/2014. Additionally, COD and TSS were not sampled at catch basin #05 in Q3/2013.

J. DMRs Not Submitted or Submitted Late

Section S9.A.4. of the ISGP states "The Permittee shall submit a DMR each reporting period, whether or not the *facility* has discharged *stormwater* from the site."

According to the DOE PARIS website, there were no DMRs submitted for catch basin #01 in Q3/2013, and no DMRs submitted for either catch basin #01 or #05 in Q3/2014 and Q4/2014.

Table 7 included in **Section S9.** of the 2010 ISGP identifies that the DMR due date following the second quarter is Aug. 14th.

According to the DOE PARIS website, the Q2/2014 DMR was digitally received on 8/20/14.

K. DMR Inaccurate

Section G2.D. of the ISGP says that any person signing a permit required document shall make the certification that "…the information submitted is, to the best of my knowledge and belief, true, accurate, and complete…"

I noted that the Spectra lab report dated 12/23/15 showed a fecal coliform result for monitoring point #01 that said 'ND' (**Photo 41**), however, on the Q4/2015 DMR the fecal coliform was listed as '50' for outfall #01 (**Photo 42**).

The fecal coliform value for outfall #01 was inaccurately reported in Q4/2015.

L. Sample Preservation

Section S4.C. of the ISGP says that sample analysis must be conducted according to 40 CFR Part 136 which identifies a preservation temperature of ≤6°C for many of the parameters required to be monitored by the permit.

The COCs showed that Spectra had only recorded the temperature of samples upon receipt on the COCs in Q4/2015. I informed Mr. Waldron that ensuring that Spectra records the temperature upon receipt is important in demonstrating that the samples have been properly preserved.

The Q4/2015 COCs showed that the temperature upon receipt was greater than 10°C (**Photos 39 & 40**).

M. pH Holding Times Exceeded

Section S4.C. of the ISGP says that sample analysis must be conducted according to 40 CFR Part 136, which identifies a hold time of 15 minutes for pH.

After reviewing the COCs and lab reports from Q2/2011-Q1/2016, I noted that pH analysis was conducted off-site by Spectra.

The pH holding time was exceeded in all quarters in which samples were collected.

N. Missing Records

Section S9.C. of the ISGP says that the permittee shall retain permit documents for a period of five years, including records of sampling information and BMP maintenance records.

BMC did not have copies of their Q3/2013 COC or their BPLC vacuum sweeping invoices from 3/15/16, 3/1/16, 1/15/16, 7/15/15, 7/1/15, 7/1/14, and all invoices prior to 5/15/14.

XI. Closing Conference

I called Mr. Waldron on 5/23/16 to conduct a final closing conference where I recapped inspection observations and also thanked him for his time and assistance with the inspection. I then e-mailed Mr. Waldron a summary of the areas of concern listed above (**Attachment G**).

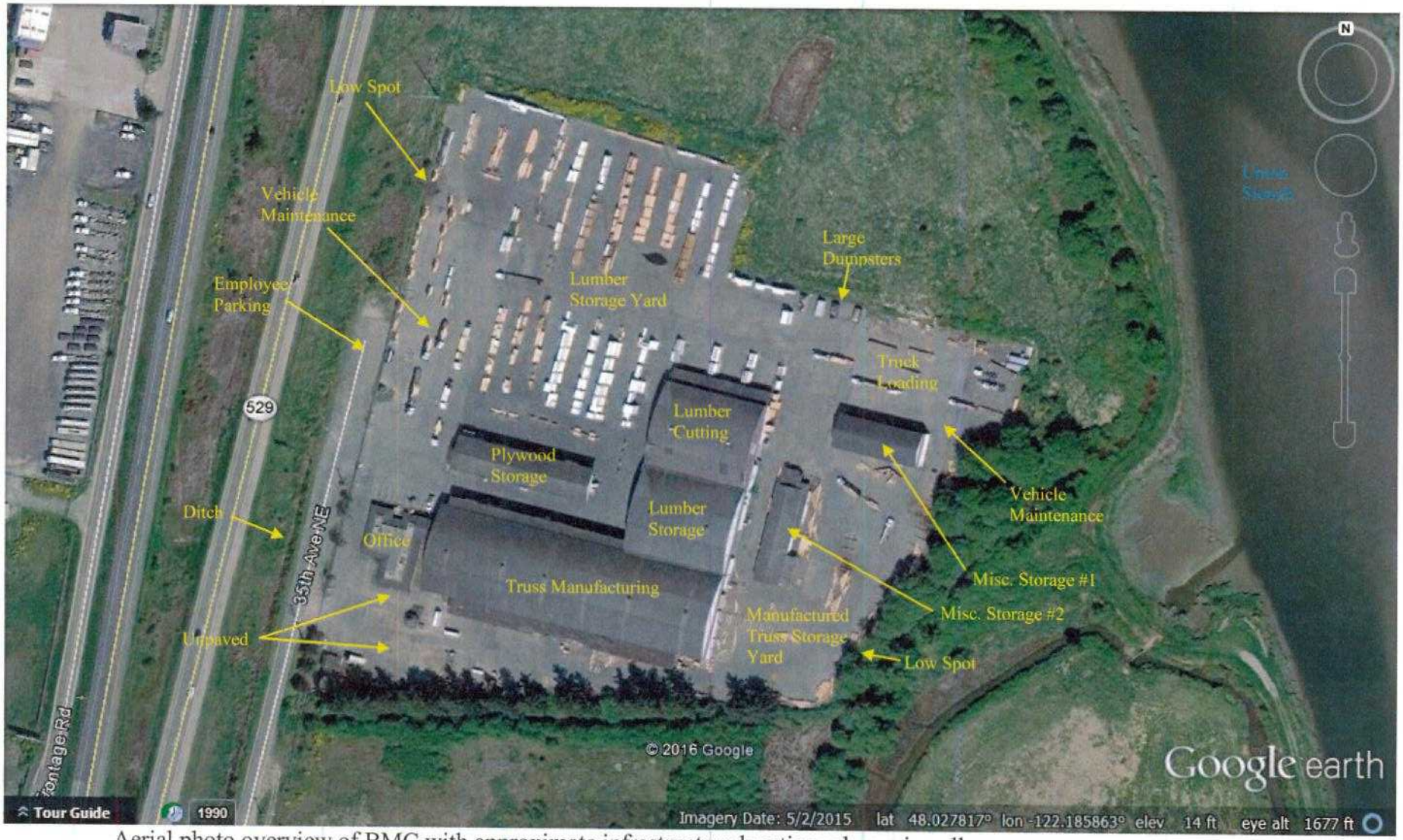
Report Completion Date: 6/17/16

Lead Inspector Signature: Brian

ATTACHMENT A

Site Maps


420+00
410+00
400+00
390+00
Union Slough
11TH AVE NE
38TH AVE NE
28TH PL NE
Dike Stationing
Existing Dike
Parcel Boundary
100' Dike Buffer
0
200
400 Feet
Map Printed: 3/4/2016
This Map has been Produced using the Best Information Available. However, The City of Everett in no way guarantees its accuracy.
G:\Basemaps\Facilities\Dikes\DOS\DikingDistrict5_BMCParcel.mxd
N



Aerial photo overview of BMC with approximate infrastructure locations shown in yellow.

ATTACHMENT B

Photo Log

(All photographs were taken by Brian Levo on either 4/29/16 or 5/10/16)

Photo 1 (SI850525): SWPPP map. Note that the brightness and contrast of this photo have been increased.

Photo 2 (SI850487): Northern view of the lumber storage yard from the plywood storage building.

Photo 3 (SI850482): Storm drain #04 to the north of the plywood storage building. Note that no stormwater filter inserts were installed in this drain on 4/29/16.

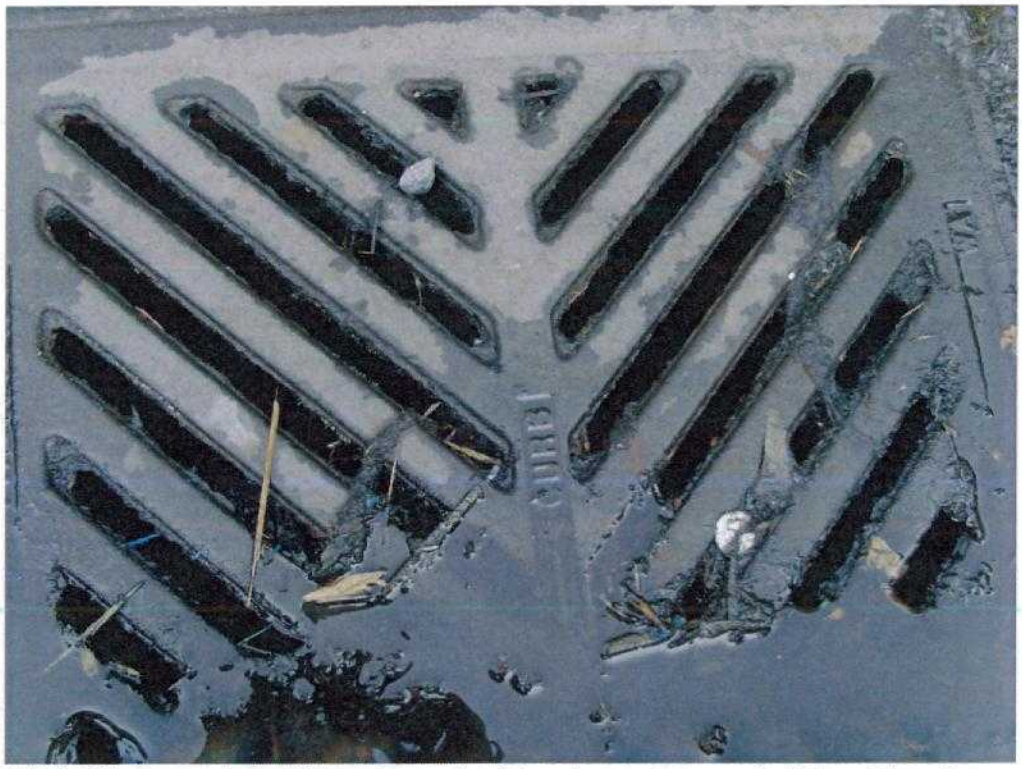


Photo 4 (SI850483): Storm drain #04 to the north of the plywood storage building. Note that no stormwater filter inserts were installed in this drain on 4/29/16.

Photo 5 (SI850485): Storm drain #03 to the north of the plywood storage building. Note that a sheen was flowing into the drain and that no stormwater filter inserts were installed in this drain on 4/29/16.

Photo 6 (SI850481): Storm drain #05 (yellow arrow) to the northwest of the plywood storage building.

Photo 7 (SI850488): Storm drain #05 to the northwest of the plywood storage building. Note the sheen in proximity to the drain and that no stormwater filter inserts were installed in this drain on 4/29/16.

Photo 8 (SI850540): View of the filter inserts inside storm drain #05. This photo was taken on 5/10/16.

Photo 9 (SI850549): Western view of the ditch along the west side of the employee parking area.

Photo 10 (SI850551): Northern view of the ditch that runs along the west side of the property. Taken from 35th Ave NE south of the entrance to the facility.

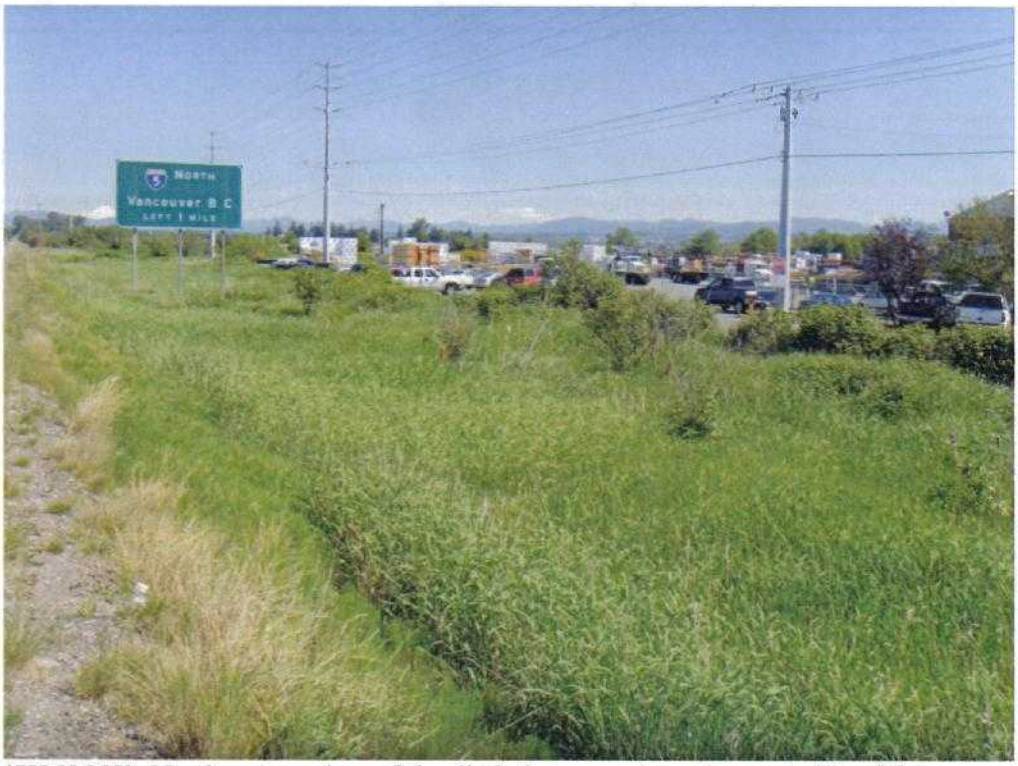


Photo 11 (SI850552): Northeastern view of the ditch that runs along the west side of the property. Taken from Hwy 529 directly west of the facility's employee parking area.

Photo 12 (SI850492): Northern view of the low spot near the northwest corner of the lumber yard.

Photo 13 (SI850493): Eastern view of the low spot near the northwest corner of the lumber yard.

Photo 14 (SI850494): Sheen on the standing water at the low spot near the northwest corner of the lumber yard.

Photo 15 (SI850496): Northern view of the ditch along the northwest side of the lumber yard. This photo was taken from the vicinity of the low spot.

Photo 16 (SI850497): Northern view of the ditch from the northwestern most corner of the lumber yard.

Photo 17 (SI850499): Sheen on the upstream portion of the standing water at the low spot.

Photo 18 (SI850500): Sheen on the pavement on the north side of the lumber yard.

Photo 19 (SI850501): Sheen on the pavement on the north side of the lumber yard.

Photo 20 (SI850502): Northern view of two garbage dumpsters (grey) and a metal scrap dumpster (orange). Only the middle dumpster had a lid and it was open at the time of the 4/29/16 inspection.

Photo 21 (SI850503): Northeastern view of a metal scrap dumpster (orange) and a wood scrap dumpster (green) without lids.

Photo 22 (SI850505): Southeastern view of the truck loading area and miscellaneous storage building #1.

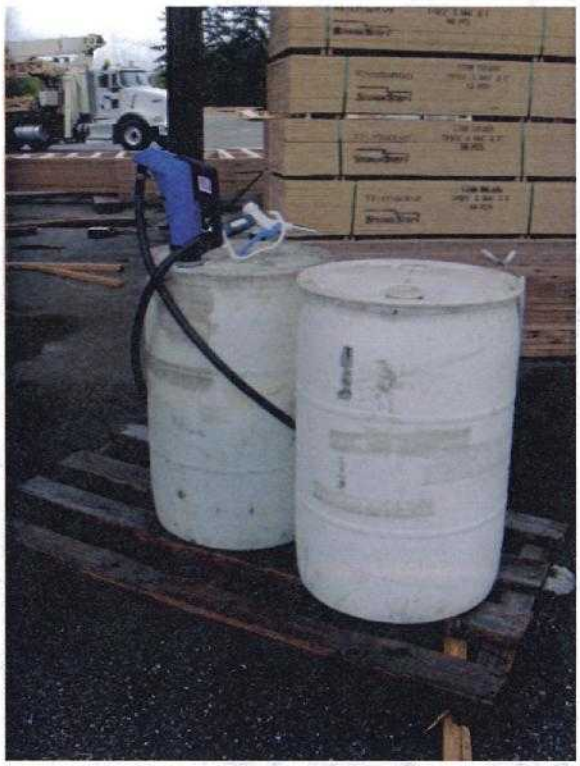


Photo 23 (SI850507): One partially-full and one empty drum of Blue Def stored under the miscellaneous storage building #1 roof without secondary containment.

Photo 24 (SI850506): 10 partially-full paint cans stored uncovered and without secondary containment at the eastern corner of the truck loading area.

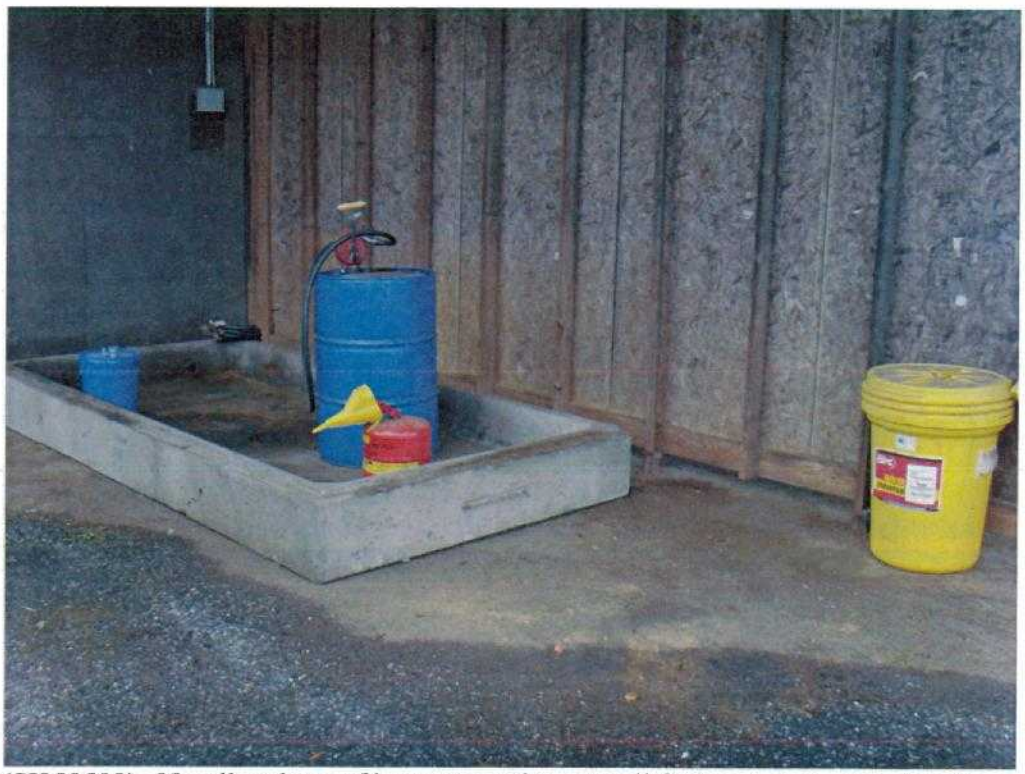


Photo 25 (SI850509): 55-gallon drum of kerosene and two small fuel containers stored inside secondary containment at the miscellaneous storage building #2. Note that two spill kits were stored near-by (one in a yellow barrel is shown here).

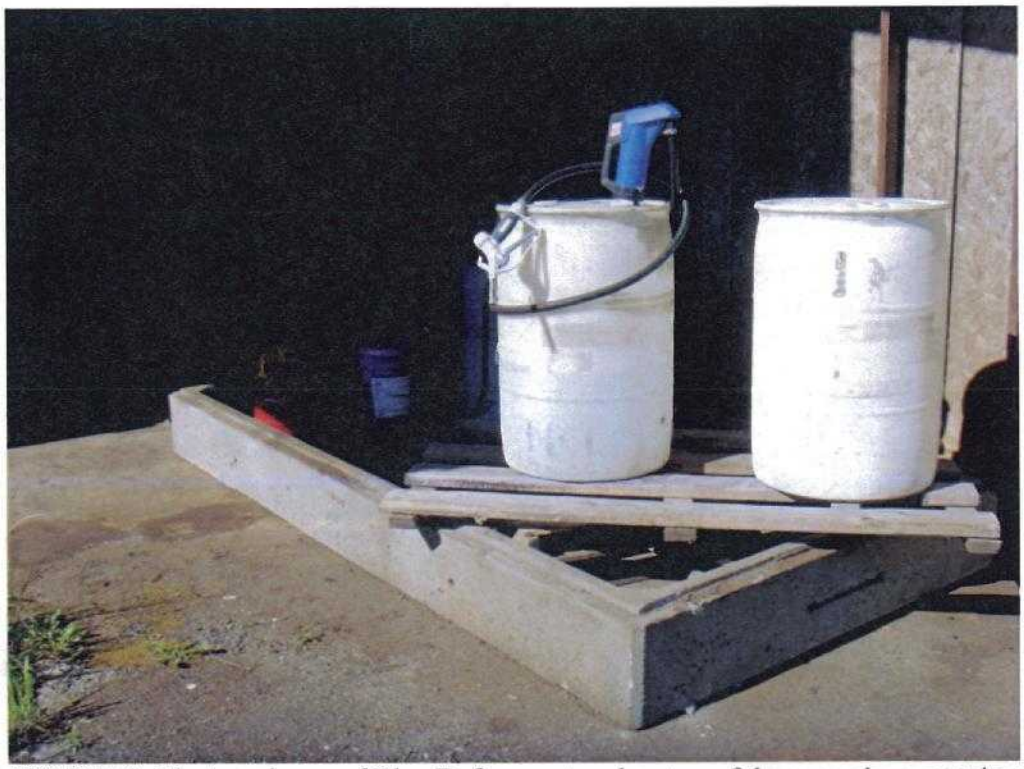


Photo 26 (SI850544): The two drums of Blue Def were stored on top of the secondary containment at the miscellaneous storage building #2 at the time of the 5/10/16 inspection.

Photo 27 (SI850543): 'Mini-Zamboni' sweeping machine.

Photo 28 (SI850513): Three 55-gallon drums and a small drum stored without secondary containment, and a waste bin without a lid, on the south side of the miscellaneous storage building #2. Two of the 55-gallon drums were open at the top and were partially filled with liquid.

Photo 29 (SI850546): Northern view of the area that drains to the low spot on the southeast side of the built truss storage yard.

Photo 30 (SI850512): Low spot on the southeast side of the built truss storage yard.

Photo 31 (SI850515): Two small waste bins without lids on the east side of the lumber storage and lumber cutting buildings.

Photo 32 (SI850516): A waste bin without a lid on the east side of the lumber storage and lumber cutting buildings.

Photo 33 (SI850518): Western view of the south side of the truss manufacturing building. Note the wood waste bin without a lid on the right side of the photo.

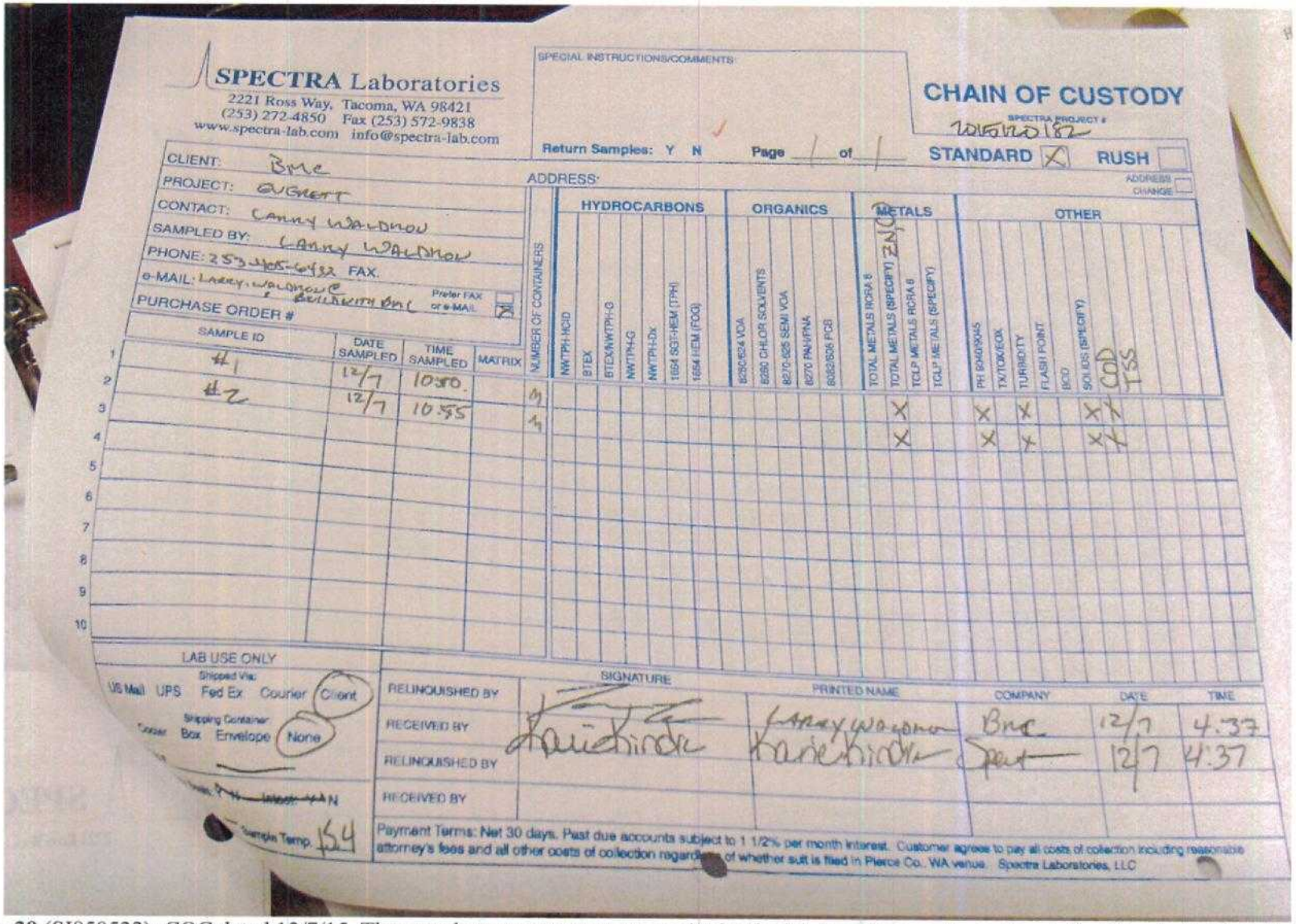
Photo 34 (SI850519): A waste bin without a lid on the south side of the truss manufacturing building.

Photo 35 (SI850520): View inside a wood waste bin without a lid on the south side of the truss manufacturing building.

Photo 36 (SI850523): A waste bin without a lid on the south side of the truss manufacturing building.

Photo 37 (SI850524): A dumpster without a lid at the northwest corner of the truss manufacturing building.

Photo 38 (SI850522): Southern view of storm drain #01. Note the sediment in proximity to the drain. This photo was taken on 4/29/16.



SPECTRA Laboratories
2221 Ross Way, Tacoma, WA 98421
(253) 272-4850 Fax (253) 572-9838
www.spectra-lab.com info@spectra-lab.com

SPECIAL INSTRUCTIONS/COMMENTS:

CHAIN OF CUSTODY

SPECTRA PROJECT # 1512N0182

Return Samples: Y N Page 1 of 1 STANDARD X RUSH

CLIENT: BMC
PROJECT: QUINCY
CONTACT: LARRY WALDRON
SAMPLED BY: LARRY WALDRON
PHONE: 253 405-6432 FAX:
e-MAIL: LARRY.WALDRON@BUILDWITHBMC.COM Prefer FAX or e-MAIL
PURCHASE ORDER #

ADDRESS:

ADDRESS CHANGE

	SAMPLE ID	DATE SAMPLED	TIME SAMPLED	MATRIX	NUMBER OF CONTAINERS	HYDROCARBONS: NWTPH-HCID; BTEX; BTEX/NWTPH-G; NWTPH-G; NWTPH-Dx; 1664 SGT-HEM (TPH); 1664 HEM (FOG)	ORGANICS: 8260/624 VOA; 8260 CHLOR SOLVENTS; 8270/625 SEMI VOA; 8270 PAH/PNA; 8082/608 PCB	METALS: TOTAL METALS RCRA 8; TOTAL METALS (SPECIFY) ZN; TCLP METALS RCRA 8; TCLP METALS (SPECIFY)	OTHER: PH 9040/9045; TX/TOX/EOX; TURBIDITY; FLASH POINT; BOD; SOLIDS (SPECIFY) COD TSS
1	#1	12/7	10:50		4			X	X X X
2	#2	12/7	10:55		4			X	X X X
3									
4									
5									
6									
7									
8									
9									
10									

LAB USE ONLY
Shipped Via: US Mail UPS Fed Ex Courier Client
Shipping Container: Box Envelope None
Sample Temp. 1.4

	SIGNATURE	PRINTED NAME	COMPANY	DATE	TIME
RELINQUISHED BY		Larry Waldron	BMC	12/7	4:37
RECEIVED BY				12/7	4:37
RELINQUISHED BY					
RECEIVED BY					

Payment Terms: Net 30 days. Past due accounts subject to 1 1/2% per month interest. Customer agrees to pay all costs of collection including reasonable attorney's fees and all other costs of collection regardless of whether suit is filed in Pierce Co. WA venue. Spectra Laboratories, LLC

Photo 39 (SI850532): COC dated 12/7/15. The sample temperature upon receipt by the lab is written on the bottom left of the sheet. Note that this photo has been cropped and that the brightness and contrast have been increased.

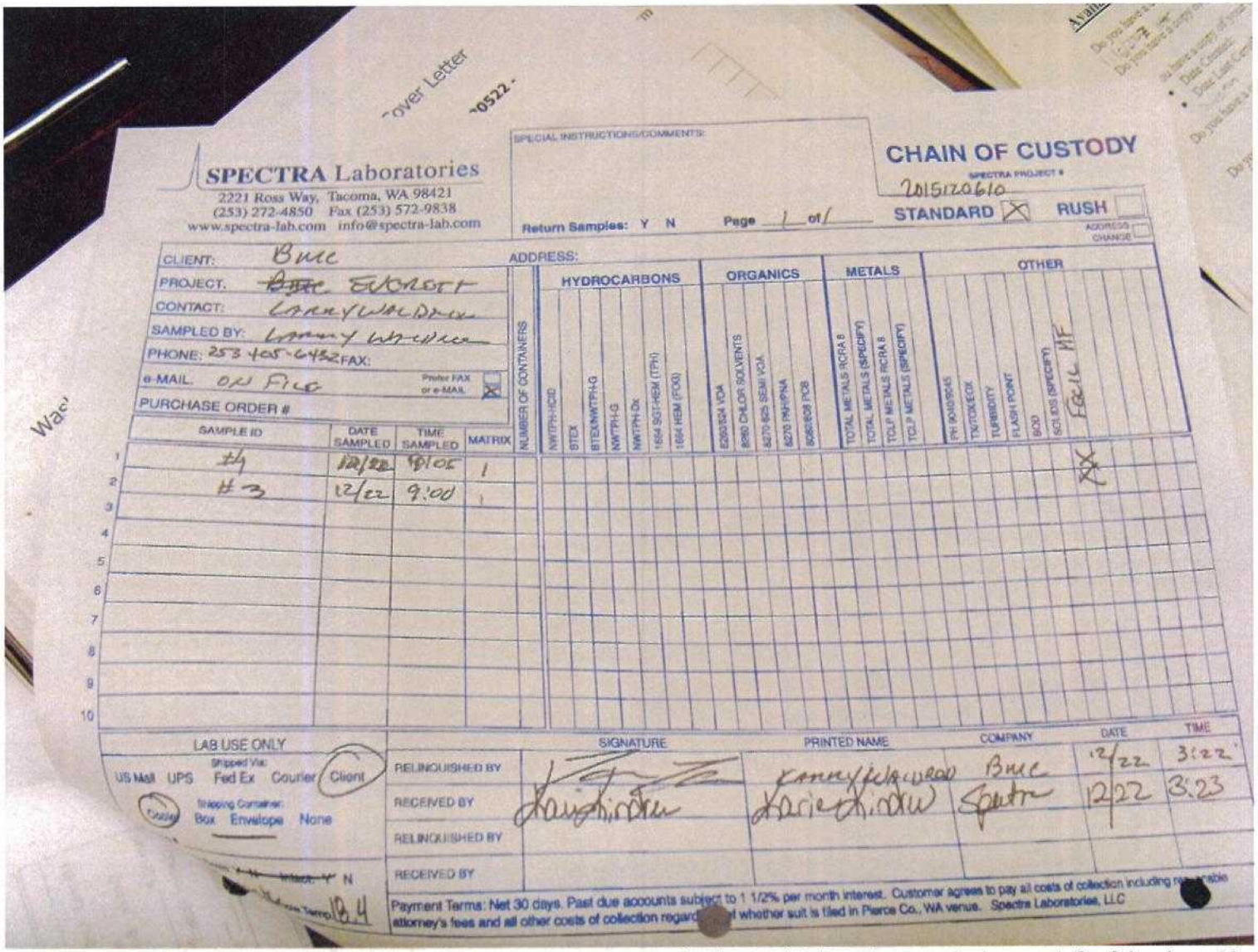
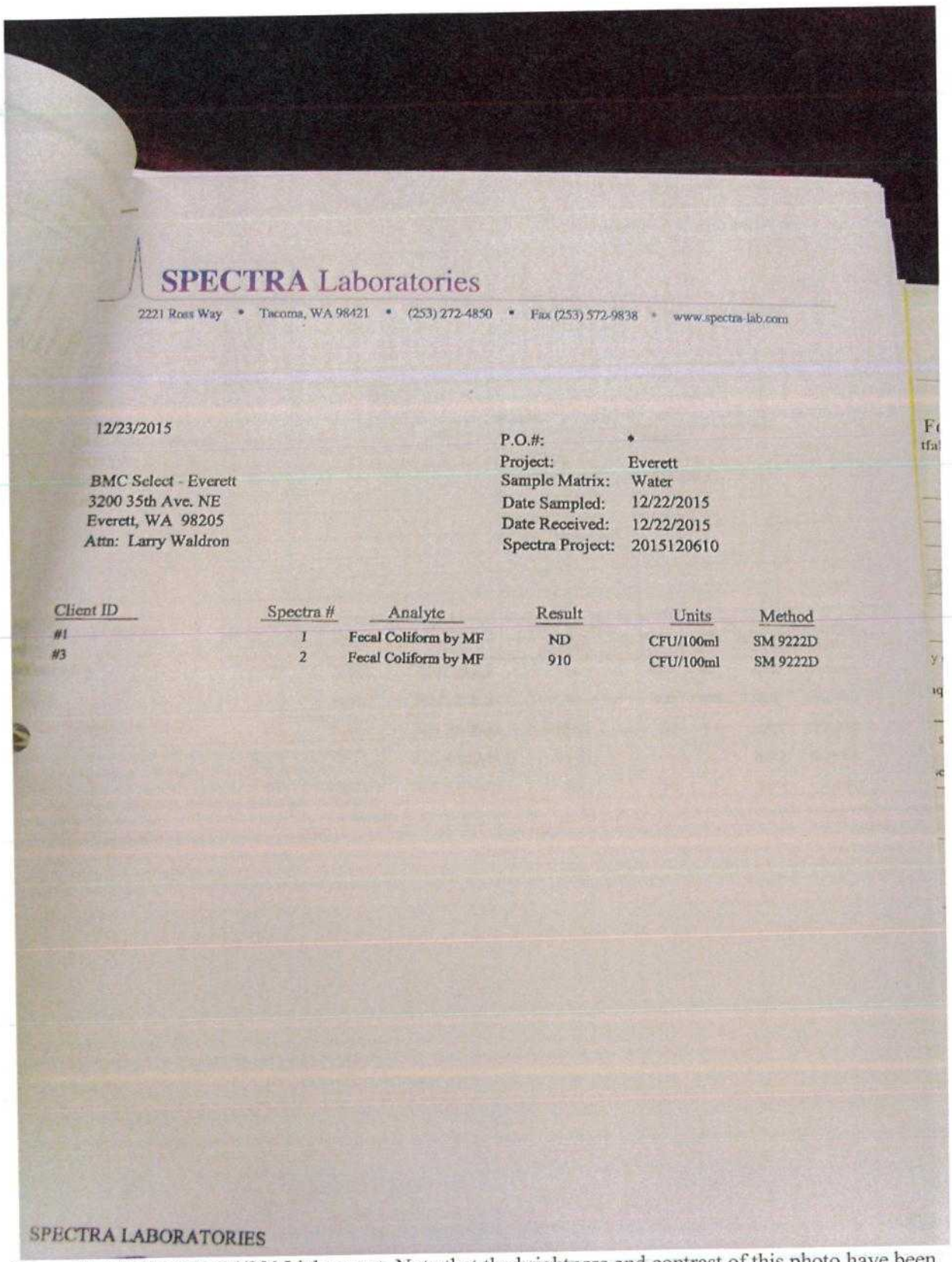


Photo 40 (SI850533): COC dated 12/22/15. The sample temperature upon receipt by the lab is written on the bottom left of the sheet. Note that the brightness and contrast of this photo have been increased.



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12/23/2015

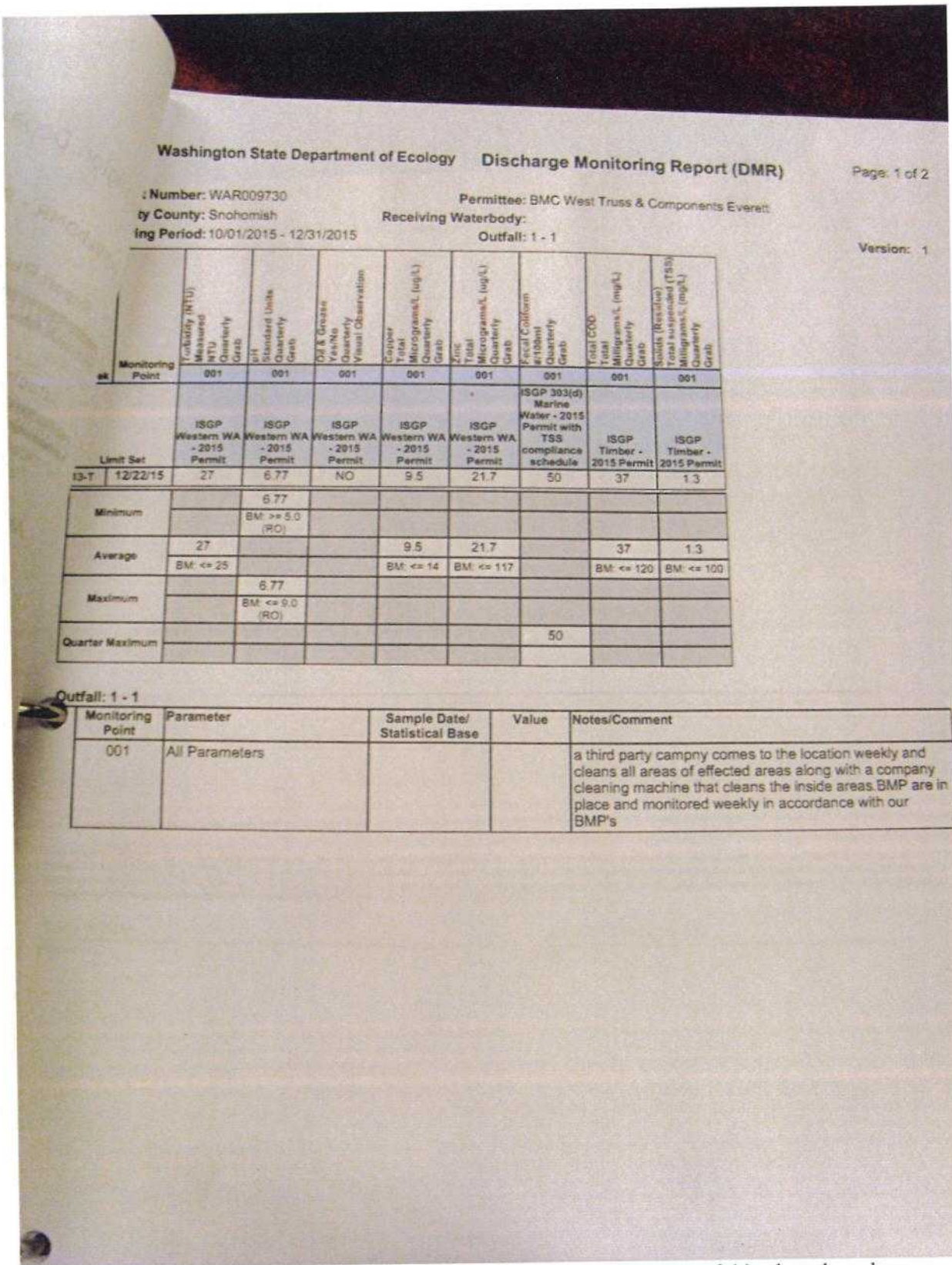
BMC Select - Everett
3200 35th Ave. NE
Everett, WA 98205
Attn: Larry Waldron

P.O.#: •
Project: Everett
Sample Matrix: Water
Date Sampled: 12/22/2015
Date Received: 12/22/2015
Spectra Project: 2015120610

Client ID	Spectra #	Analyte	Result	Units	Method
#1	1	Fecal Coliform by MF	ND	CFU/100ml	SM 9222D
#3	2	Fecal Coliform by MF	910	CFU/100ml	SM 9222D

SPECTRA LABORATORIES

Photo 41 (SI850531): Q4/2015 lab report. Note that the brightness and contrast of this photo have been increased.



Washington State Department of Ecology **Discharge Monitoring Report (DMR)** Page: 1 of 2

Number: WAR009730 **Permittee:** BMC West Truss & Components Everett
County: Snohomish **Receiving Waterbody:**
Reporting Period: 10/01/2015 - 12/31/2015 **Outfall:** 1 - 1 **Version:** 1

ask	Monitoring Point	Turbidity (NTU) Measured NTU Quarterly Grab	pH Standard Units Quarterly Grab	Oil & Grease Yes/No Quarterly Visual Observation	Copper Total Micrograms/L (ug/L) Quarterly Grab	Zinc Total Micrograms/L (ug/L) Quarterly Grab	Fecal Coliform #/100ml Quarterly Grab	Total COD Total Milligrams/L (mg/L) Quarterly Grab	Solids (Residue) Total suspended (TSS) Milligrams/L (mg/L) Quarterly Grab
		001	001	001	001	001	001	001	001
	Limit Set	ISGP Western WA - 2015 Permit	ISGP Western WA - 2015 Permit	ISGP Western WA - 2015 Permit	ISGP Western WA - 2015 Permit	ISGP Western WA - 2015 Permit	ISGP 303(d) Marine Water - 2015 Permit with TSS compliance schedule	ISGP Timber - 2015 Permit	ISGP Timber - 2015 Permit
13-T	12/22/15	27	6.77	NO	9.5	21.7	50	37	1.3
Minimum			6.77						
			BM: >= 5.0 (RO)						
Average		27			9.5	21.7		37	1.3
		BM: <= 25			BM: <= 14	BM: <= 117		BM: <= 120	BM: <= 100
Maximum			6.77						
			BM: <= 9.0 (RO)						
Quarter Maximum							50		

Outfall: 1 - 1

Monitoring Point	Parameter	Sample Date/ Statistical Base	Value	Notes/Comment
001	All Parameters			a third party campny comes to the location weekly and cleans all areas of effected areas along with a company cleaning machine that cleans the inside areas.BMP are in place and monitored weekly in accordance with our BMP's

Photo 42 (SI850530): Q4/2015 DMR. Note that the brightness and contrast of this photo have been increased.

ATTACHMENT C

Filter Insert Product Sheet